



SQG News

Compliance Assistance and Pollution Prevention

Top Ten SQG Self-Certification Form Errors

For those of you in Belknap, Carroll, Coos, Grafton, Merrimack and Sullivan Counties, it's time to re-examine your hazardous waste streams and all of the documents that let us know you are managing your wastes properly. Don't forget, your Self-Certification Form, and updated RCRA C Site Identification Form and fee are due by January 1, 2018. To help you and everyone else in the state with this process, we have created a top-10 list of common errors made when it's time to re-notify.

NHDES-S-01-009	 NEW HAMPSHIRE DEPARTMENT OF Environmental Services	RCRA C SITE IDENTIFICATION FORM Notification of Hazardous Waste Activity NHDES Waste Management Division-RIMS PO Box 95, Concord NH 03302-0095 (603) 271-2921 or hazwastereporting@des.nh.gov www.des.nh.gov	
Rule: Env-Hw 504.02(a)			

1. Forgetting to Update the RCRA C Site Identification Form.

This form is included in the packet that is sent to you every three years, along with the SQG Form. It is a good opportunity to review the information. Even if your SQG Form is not due this year, it's a requirement to update the RCRA C Site Identification Form (Notification Form) if and when changes are made. Is all the contact information still correct? Is your waste generation information still accurate? You may no longer generate certain wastes, may generate more or less of certain wastes, or you may generate an entirely new waste stream. Maybe you found a way to eliminate your hazardous waste generation altogether. We want to know all that. If you have moved, not only do you need to provide the new address, you will need a new EPA ID # and will need to pay the initial \$150 fee. The number assigned to your business stays with the physical property. The new number will be associated with the new address.

2. Including Universal Wastes in Section D (Waste Generation and Waste Type).

Universal wastes (batteries, fluorescent lamps, mercury containing devices, cathode ray tubes from older TVs and computers (CRTs), pesticides and antifreeze) are wastes generated by a wide variety of establishments. They are still considered hazardous but are managed under less stringent rules designed to reduce the regulatory burden and increase proper management for the variety of businesses that generate these wastes. We will address universal wastes in more

Pollution Prevention Corner

What is Pollution Prevention (P2)? Well, I could provide you with a nice technical definition or I could provide you with a link to a short animated video that explains what we mean by pollution prevention and how it can save you money! I'm going with the video – here's the link:

<https://www.youtube.com/watch?v=RQgCksp6kDY>

Now that you know what P2 is, we would like to help you find strategies to reduce the waste you generate.

In this section of the newsletter, we would like to highlight efforts people have made to reduce or eliminate their chemical use.

Here's an opportunity for you to share your story, which in turn may help others to make changes at their facilities. Wouldn't the world be a better place if people used fewer chemicals?

Send your story to
melissa.zych@des.nh.gov

depth in a future newsletter, but they don't need to be included in Section D of the form and don't count toward the SQG monthly 220-pound generation limit.

3. Including Used Oil in Section D

Used oil and oil filters for recycle are still regulated, but less stringently than other hazardous waste and should not be included in Section D. Similar to universal waste, used oil does not count toward the SQG monthly 220-pound generation limit. We will address used oil in a future newsletter.

4. Including Biohazard Waste in Section D

Biohazard wastes (bloody gauze, sharps, etc.) are hazardous, but not regulated under the Hazardous Waste Rules and should not be included on the SQG Form. However, they are regulated by the NHDES Solid Waste Program.

5. Waste Type in Section D.1

All sections of the form must be filled in. Answer all of the questions to the best of your ability. One of the most common mistakes we see in this section is copying the waste and amounts listed per month from the RCRA C Site Identification Form. As mentioned above, this is your opportunity to verify that the waste streams listed on both the SQG and RCRA forms are still accurate. If you have added or eliminated any waste streams, please note that on both forms. Here's an example of what we are looking for under **Waste types and activity that creates the waste in Section D.1**:

List Hazardous Waste(s)	How is it Generated?
Waste Paint	Painting Vehicles
Mineral Spirits	Cleaning Spray Gun
Waste Acids	Etching Metal

6. Quantity of Waste Generated in Section D.2.a

We want to know how much hazardous waste you **generate** each calendar month, not what you **shipped**. The term "generate" refers to the amount of waste you create or actually put into the waste container in that month. The SQG category of generators ranges from one drop up to 220 pounds (about 25 gallons or 1/2 of a 55 gallon drum) per month. If you generate more than 220 pounds in a month, you are considered a Full Quantity Generator and different rules apply. As a SQG, you are allowed to store waste indefinitely up to 2,200 pounds (other rules for larger storage amounts apply) so your monthly generation will give us a better idea of the quantities of waste you are generating. If your business generates no waste in some months, just put zero for those months. You can estimate your generation using your knowledge of your process if you don't have exact numbers. One common mistake in this section is using averages based on shipping manifests. In some cases, this may be appropriate if you do the same thing each month and ship off all of your waste on a regular basis. But often, manufacturing goes up and down during the year or depending on what job is being done. Also, sometimes only certain containers are shipped when they are full, and others may take longer to fill so aren't shipped at the same frequency. Therefore, it's better to track your waste generation accurately per month using some sort of tracking system that works for you.

FAQ - What is an acute hazardous waste?

An acute hazardous waste is an unused "P-listed waste" that has been found to be fatal to humans in low doses. These types of wastes are typically generated by pharmacies and healthcare facilities because they are often medicines and are very dangerous when administered in the wrong way or taken in the wrong dose. As a SQG, your generation of this type of waste is limited to less than 2.2lbs. If you generate more than that, you become a FQG.

If you are unsure whether you generate this type of waste, you can contact the Hazardous Waste Management Bureau at (603) 271-2942 for help with this determination.

7. Quantity of Waste stored in Section D.2.b

This question is often left blank, but you should list the amount of hazardous waste you have in storage *at the time you are filling out the form*. Your best estimate is fine, but you should add up the waste in all of the containers to put a cumulative amount. Please do not include universal wastes, used oil or biohazardous wastes. Weighing each container is not necessary. Use your best estimate, based on how full the container is and the weight of the waste per gallon, to help you figure this out.



8. Checking “No” on Certain Questions in Section E (Storage Requirements)

If you answer “No” to form items that are required, you should correct the situation prior to sending in the form. If you send in the form certifying that you are not in compliance with the storage requirements, you are likely to get a call or email to make sure you have corrected the issue(s). This is one of the most common questions answered incorrectly: “Is there a ‘No Smoking’ sign posted near ignitable or reactive wastes?” Many people check “No” or “N/A” even though they are storing these types of wastes. Often the reason is because they have a no smoking policy at their facility and feel that it is unnecessary. This is not the case. “No Smoking” signs are required to be posted near flammable or reactive waste, even if there is a no smoking policy at the business, hospital or school.

9. Extended Accumulation

If you generate hazardous waste and want to store more than 220 pounds at your facility, you need to complete the extended accumulation checklist on page 6. Many facilities leave this page blank, even though they are regularly storing and shipping more than 220 pounds of hazardous waste. Keep in mind, 220 pounds equals about half of a 55-gallon drum, so if you are filling 55-gallon drums before shipping them, you are required to follow the extended accumulation requirements. Extended accumulation won’t cost you any additional money but requires more oversight of your waste. It may make financial sense to have the transporter come to your facility less frequently. NHDES has made complying with these extended storage requirements easier by offering templates, inspection checklists or emergency postings upon request. Extended accumulation requirements will be addressed in more depth in a future newsletter.

10. Record Keeping Requirements (Section F)

You are required to keep copies of your shipping manifest for three years. You should have two copies for each shipment. One copy is what the transporter hands you and the other is delivered to you once your waste is at its final destination for proper disposal.



You are also required to submit a copy of the manifest that the transporter gives you to NHDES within five days. Many facilities think the transporter does this for them. They do not – it is your responsibility. Transporters are required to send a different manifest copy to NHDES when the waste reaches its final destination. Every time you have hazardous waste picked up, a copy of the manifest the transporter gives you (called “Generators Initial Copy” on the bottom right corner) should be scanned and emailed to hazwastereporting@des.nh.gov within five days. A photocopy can be mailed or faxed in lieu of email.

These are just some of the errors we see on a regular basis. We hope this top-10 list helps you to better understand the form and the information we are looking for. If you have questions or need assistance, you can contact Christie Faro at: (603) 271-2942 or SGQ@des.nh.gov.